

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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This document relates to:

Federal Insurance Co. v. al Qaida, 03 CV 06978 (RCC)

**AFFIRMATION OF SEAN P. CARTER IN OPPOSITION TO
ABDULRAHMAN ALAMOUDI'S MOTION TO DISMISS**

Sean P. Carter, Esq., affirms as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned matter, and a member of the law firm Cozen O'Connor. I submit this Affirmation to transmit to the Court the following documents submitted in opposition to the Motion to Dismiss filed by Defendant Abdulrahman Alamoudi.

2. Exhibit 1 to this Affirmation is a true and accurate copy of U.S. Immigration and Customs Enforcement Agent Brett Gentrup's "Supplemental Declaration in Support of Detention" from *United States v. Alamoudi* (E.D. Va.) (October 22, 2003), which is available at <http://news.findlaw.com/hdocs/docs/terrorism/usalamoudi102203sdec.pdf>.

3. Exhibit 2 to this Affirmation is a true and accurate copy of *Progress Since 9/11: The Effectiveness of U.S. Anti-Terrorist Financing Efforts: Hearings Before the Subcomm. on Oversight and Investigations of the House Comm. on Financial Services* (March 11, 2003) (prepared testimony of Matthew Epstein with Evan Kohlman, Senior Terrorism Analysts, The Investigative Project), which is available at <http://financialservices.house.gov/media/pdf/031103me.pdf>.

4. Exhibit 3 to this Affirmation is a true and accurate copy of U.S. Immigration and Customs Enforcement Agent Brett Gentrup's "Affidavit in Support of Criminal Complaint" from *United States v. Alamoudi* (E.D. Va.) (September 30, 2003), which is available at <http://news.findlaw.com/hdocs/docs/terrorism/usalamoudi93003cmp.pdf>.

5. Exhibit 4 to this Affirmation is a true and accurate copy of a Press Release from the U.S. Department of Justice entitled "*Abdurahman Alamoudi Sentenced to Jail in Terrorism Financing Case*" (October 15, 2004), which is available at http://www.usdoj.gov/opa/pr/2004/October/04_crm_698.htm.

6. Exhibit 5 to this Affirmation is a true and accurate copy of *The Financing of Terror Organizations: Hearings Before the Senate Comm. on Banking, Housing and Urban Affairs* (October 22, 2003) (prepared testimony of Matthew A. Levitt, Senior Fellow, The Washington Institute for Near East Policy, "UNTANGLING THE TERROR WEB: The Need for a Strategic Understanding of the Crossover Between International Terrorist Groups to Successfully Prosecute the War on Terror"), which is available at http://banking.senate.gov/_files/levitt.pdf.

7. Exhibit 6 to this Affirmation is a true and accurate copy of a Fact Sheet on Executive Order 13224 from the U.S. Department of State's Office of the Coordinator for Counterterrorism (December 20, 2002), which is available at <http://www.state.gov/s/ct/rls/fs/2002/16181.htm>.

8. Exhibit 7 to this Affirmation is a true and accurate copy of Terrorism Financing: Origination, Organization, and Prevention: Hearings Before the U.S. Senate Committee on Governmental Affairs, S. HRG. 108-245 (July 31, 2003), which is also available at http://hsgac.senate.gov/_files/sprt108245terror_finance.pdf.

Affirmed in Philadelphia, Pennsylvania on February 4, 2005.

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Sean P. Carter

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